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PATENT APPLICATION

ATTORNEY DOCKET NO. 200312393-1

IN THE
UNITED STATES PATENT AND TRADEMARK OFFICE

Inventor: Steven S. HOMER et al.

Confirmation No.: 2458

Application No.: 10/765,806

Examiner: Edwards, Anthony Q.

Filing Date: January 27, 2004

Group Art Unit: 2835

Title: PERSONAL COMPUTING DEVICE WITH REMOVABLE ACCESSORY MODULE

Mail Stop Appeal Brief - Patents
Commissioner For Patents
PO Box 1450
Alexandria, VA 22313-1450

TRANSMITTAL OF REPLY BRIEF

Transmitted herewith is the Reply Brief with respect to the Examiner's Answer mailed on November 28, 2005.

This Reply Brief is being filed pursuant to 37 CFR 1.193(b) within two months of the date of the Examiner's Answer.

(Note: Extensions of time are not allowed under 37 CFR 1.136(a))

(Note: Failure to file a Reply Brief will result in dismissal of the Appeal as to the claims made subject to an expressly stated new ground rejection.)

No fee is required for filing of this Reply Brief.

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Respectfully submitted,

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IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

**APPEAL FROM THE EXAMINER TO THE BOARD
OF PATENT APPEALS AND INTERFERENCES**

In re Application of: Steven S. HOMER et al.
Serial No.: 10/765,806
Filing Date: January 27, 2004
Group Art Unit: 2835
Examiner: Edwards, Anthony Q.
Title: PERSONAL COMPUTING DEVICE WITH
REMOVABLE ACCESSORY MODULE
Docket No.: 200312393-1

MAIL STOP: APPEAL BRIEF-PATENTS

Commissioner for Patents
P.O. Box 1450
Alexandria, Virginia 22313-1450

Dear Sir:

REPLY BRIEF

Applicants respectfully submit this Reply Brief pursuant to 37 C.F.R. § 1.193(b)
in response to the Examiner's Answer mailed November 28, 2005.

STATUS OF CLAIMS

Claims 1-5, 8-13, 20-23 and 25 stand rejected pursuant to a Final Office Action mailed June 14, 2005. Claims 6, 7, 14-19 and 24 were objected to in the Final Office Action mailed June 14, 2005. Claims 1-5, 8-13, 20-23 and 25 are presented for appeal.

GROUND OF REJECTION TO BE REVIEWED ON APPEAL

1. Claims 1-5, 8-13, 20-23 and 25 were rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,532,147 issued to Christ, Jr. (hereinafter “*Christ*”) in view of U.S. Patent No. 6,700,773 issued to Adriaansen et al. (hereinafter “*Adriaansen*”).

ARGUMENTA. Claims 1-5 and 8-13

In the Examiner's Answer, the Examiner asserts that *Christ* discloses a "clutch member having a variable height" as recited by Claims 1 and 8 (Examiner's Answer, pages 8 and 9). Applicants respectfully disagree. As discussed in Applicants' Appeal Brief, Applicants respectfully submit that the slidable arrangement of the members 84 and 86 of *Christ* is not a "clutch member." *Christ* appears to disclose that member 84 is formed with a channel to facilitate slidable movement of member 86 of *Christ* therewith (*Christ*, figures 7-9). The Examiner appears to equate the "channel" formed in member 84 of *Christ* as the "clutch member" recited by Claim 1. As discussed in Applicants' Appeal Brief, Applicants respectfully submit that the "channel" formed in the member 84 of *Christ* is not a "clutch member" as recited by Claim 1 at least because such "channel" is not representative of a "clutch" mechanism as such "channel" does not provide for any engagement/disengagement of elements. Therefore, neither *Christ* nor *Adriaansen*, alone or in combination, discloses, teaches or suggests the limitations of Claims 1 and 8.

Further, Applicants respectfully submit that the "channel" of member 84 of *Christ*, which the Examiner appears to equate to a "clutch member" recited by Claims 1 and 8, does not, itself, "hav[e] a variable height" as recited by Claims 1 and 8. To the contrary, the "channel" of member 84 is formed as a fixed element of the member 84 of *Christ* and, therefore, the "channel" of member 84, itself, does not have a "variable height" as recited by Claims 1 and 8. Moreover, the "channel" of member 84 of *Christ* does not "hav[e] a variable height operable to enable the lid to close over the at least one removable center module" as recited by Claims 1 and 8. To the contrary, *Christ* appears to disclose that when the display screen 24 is in a closed position relative to the base 22 of *Christ*, the "channel" portion of member 84 is located along a side area of the base 22 of *Christ* (*Christ*, figure 7). Accordingly, any "variable height" that may be attributed to the "channel" of member 84 (e.g., as a result of movement of the member 84) appears to be irrelevant at least because when the display screen 24 is in a closed position relative to the base 22 of *Christ*, the "channel" of member 84 appears to be located in a single

position, namely, along a side area of the base 22 of *Christ*. Therefore, for at least this reason also, Applicants respectfully submit that neither *Christ* nor *Adriaansen*, alone or in combination, discloses, teaches or suggests the limitations of Claims 1 and 8. Therefore, Claims 1 and 8, and Claims 2-5 and 8-12 that depend respectively therefrom, are in condition for allowance.

B. Claims 20-23 and 25


In the Examiner's Answer, the Examiner states that that *Adriaansen* discloses a keyboard 110 having a first thickness and a digitizer 113 having a second thickness (Examiner's Answer, page 9 (referring to figures 22 and 23 of *Adriaansen*)). Applicants respectfully disagree. *Adriaansen* appears to disclose that a keyboard 111 is rotatable about a hinge assembly 114 to enable use of a digitizer 113 normally disposed beneath or under the keyboard 111 (*Adriaansen*, column 14, lines 52-65, figures 22 and 23). *Adriaansen* does not disclose or even suggest that the keyboard 110 and digitizer 113 are different thicknesses, nor has the Examiner explicitly identified any such disclosure in *Adriaansen*. Moreover, independent Claim 20 recites "a plurality of different size removable center modules" (emphasis added). The digitizer 113 of *Adriaansen* referred to by the Examiner does not appear to be removable. To the contrary, the digitizer 113 of *Adriaansen* appears to remain in a fixed position in the *Adriaansen* device, namely, beneath the keyboard 111. Therefore, Applicants respectfully submit that neither *Christ* nor *Adriaansen*, alone or in combination, discloses, teaches or suggests the limitations of Claim 20. Therefore, Claim 20, and Claims 22, 23 and 25 that depend therefrom, are in condition for allowance.

CONCLUSION

Applicants have demonstrated that the present invention as claimed is clearly distinguishable over the art cited of record. Therefore, Applicants respectfully request the Board of Patent Appeals and Interferences to reverse the final rejection of the Examiner and instruct the Examiner to issue a notice of allowance of all claims.

No fee is believed due with this Reply Brief. If, however, Applicants have overlooked the need for any fee, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 08-2025 of Hewlett-Packard Company.

Respectfully submitted,


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Date: January 27, 2006

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